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*Via Electronic Mail (SNakamura@aqmd.gov)*

Ms. Susan Nakamura  
Acting Assistant Deputy Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765-4182

**Re: Proposed Rule 1430 – Control of Emissions from Grinding Operations at Metal Forging Facilities**

Dear Ms. Nakamura:

The Independent Lubricant Manufacturers Association (“ILMA” or “Association”) submits these comments on the South Coast Air Quality Management District’s (“SCAQMD”) pre-rulemaking draft Proposed Rule 1430 - Control of Emissions from Grinding Operations at Metal Forging Facilities. ILMA has participated in the stakeholder meetings on Proposed Rule 1430 and respectfully requests that its suggested modification below be incorporated into the draft rule eventually proposed for public comment.

### **Introduction to ILMA**

ILMA is national trade association with 355 member companies. As a group, ILMA members blend, compound, and sell over 25 percent of the United States’ lubricant needs (*e.g.*, passenger car motor oils) and nearly 80 percent of the metalworking fluids (“MWFs”) utilized in the country.

Independent lubricant manufacturers by definition are neither owned nor controlled by companies that explore for or refine crude oil to produce lubricant base stocks or that produce chemical additives. Base oils are purchased from refiners, who also are competitors in the sale of finished products. Additives are purchased from suppliers, who also may be competitors in the sale of finished products. ILMA members succeed by processing, producing, and distributing high-quality, often specialized, lubricants.

### **Section (b) – Applicability – Should be More Precisely Defined**

Section (b) - Applicability states that “[t]his rule applies to all persons who own or operate a metal forging facility where dry metal grinding or metal cutting operations are conducted. This rule does not apply to metal grinding or metal cutting conducted under a continuous flood of metal removal fluid.”

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**President, Beth Ann Jones**, Hangsterfer’s Laboratories, Inc.

**Vice President, Dave Croghan**, Maxum Petroleum

**Treasurer, Barbara Kudis**, Allegheny Petroleum Products Company

**Secretary, Chuck Decker**, American Oil & Supply International LLC

**Immediate Past President, Frank H Hamilton III**,  
South Atlantic Services, Inc.

**Chief Executive Officer, Holly Alfano**

**General Counsel, Jeffrey L. Leiter**

ILMA requests that SCAQMD add the following to this section:

A continuous flood of metal removal fluid is defined as direct application of fluid to the tool or work piece interface at a rate that is sufficient to adequately suppress metal dust emissions. Minimum Quantity Lubrication (MQL) is not considered a continuous flood of metal removal fluid since the rate of application is insufficient to suppress metal dust emissions.

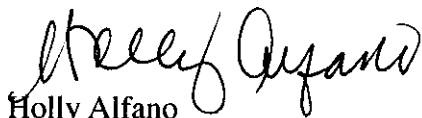
### **Definitions**

Additional definitions for "Minimum Quantity Lubrication" and "flood cooling" are needed to improve Proposed Rule. The Association is developing recommended definitions for these terms and will supplement this submission.

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ILMA urges SCAQMD to adopt the modification to the applicability section set forth above.

Sincerely,



Holly Alfano  
Chief Executive Officer

CC: ILMA's Metalworking Fluids Committee  
Jeffrey L. Leiter, Esq.  
Daniel T. Bryant, Esq.